



**NORTHLAND
COMMUNICATIONS
CORPORATION**

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VIA ELECTRONIC COMMENT FILING SYSTEM

April 11, 2007

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: 911 Compliance Status Report
WC Docket No. 05-196

Dear Ms. Dortch:

In response to Ms. Kathryn S. Berthot's letter, dated March 12, 2007, attached for filing with the FCC, please find the 911 Compliance Status Report of Northland Communications Corporation, on behalf of its affiliates and subsidiaries providing VoIP services.

Please direct any questions or correspondence to the undersigned at (206) 621-1351 or via email (paul@northlandco.com).

Sincerely,

Paul Milan
Vice President and General Counsel

cc (via email): Kathy Berthot, Chief (kathy.berthot@fcc.gov)
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Enforcement Bureau, Federal Communications Commission
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911 Compliance Status Report
FCC WC Docket No. 05-196

1. **Provision of Compliant 911 Services:** A quantification on a percentage basis, of the number of subscribers to whom you are able to provide 911 service in full compliance with the rules established in the VoIP 911 Order.

Response:

98.1% of total subscribers are served by an E911 system that complies with the VoIP 911 Order.

2. **911 Coverage:** To the extent you have not achieved full 911 compliance with the requirements of the VoIP 911 Order in all areas of the county in which you are providing interconnected VoIP services to subscribers: (i) list each PSAP serving such areas of the county; and (ii) describe in detail your plans for coming into full compliance with the requirements of the Order, including your anticipated time frame for such compliance.

Response:

PSAP	No. of subs	Compliance Plan
Marlboro Dispatch Center (South Carolina)	25	Anticipated completion of build-out to bring into full compliance is May 11, 2007.
Leake County Communications Center (Mississippi)	12	Currently investigating alternatives to present network 911 solution, including using other service providers to supply compliant 911 system.
Bonner County 911 (Idaho)	2	Currently investigating alternatives to present network 911 solution, including using other service providers to supply compliant 911 system.
Emanuel County E911 (Georgia)	21	Currently investigating alternatives to present network 911 solution, including using other service providers to supply compliant 911 system.

3. **911 Routing Information/Connectivity to Wireline E911 Network:** Provide a statement as to whether you are transmitting, as specified in the Paragraph 42 of the VoIP 911 Order, "all 911 calls to the appropriate [Public Safety Answering Point (PSAP)], designated statewide default answering point, or appropriate local emergency authority

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utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.” If you are not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include: (i) a quantification, on a percentage basis, of the number of subscribers whose 911 calls are not currently being routed to the appropriate PSAP via the dedicated Wireline E911 Network; and (ii) a detailed explanation why not.

Response:

Except as noted in Section 2, Northland is transmitting, as specified in the Paragraph 42 of the VoIP 911 Order, all 911 calls to the appropriate [Public Safety Answering Point (PSAP)], designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.

4. **New VoIP customers and/or Marketing of VoIP Service in Non-Compliant Areas:** Significantly, some providers such as AT&T and Verizon have committed to not accepting new customers in areas where the provider cannot provide 911 service. State whether you have stopped accepting new customers and marketing your VoIP services in non-compliant areas, and if so, the date in which you stopped. If you have continued to accept new customers for its services and/or market your VoIP service in areas where you are non-compliant, explain how these actions are consistent with the Commission rules. Further, indicate the overall number of subscribers currently serviced in your non-compliant areas, and the number of those subscribers the received the initial services after November 28, 2005.

Response:

Northland stopped accepting new customers and stopped marketing its 911 services in non-compliant areas on or before November 28, 2005. Northland has in place compliance and audit procedures to ensure that in the event an account is unintentionally activated in non-compliant areas or utilizing non-compliant 911 systems, such accounts are either re-provisioned to compliant 911 systems or promptly terminated. The number of subscribers serviced in non-compliant areas is listed in the response to question number 2. No subscriber listed received initial services after November 28, 2005.